

Herbert Hafif, Bar No. 27311
Greg K. Hafif, Bar No. 149515
Michael D. Dawson, Bar No. 150385
LAW OFFICES OF HERBERT HAFIF, APC
269 West Bonita Avenue
Claremont, California 91711-4784
(909) 624-1671; Fax (909) 625-7772

Steven L. Miller, Bar No. 106023
16133 Ventura Blvd., Suite 1200
Encino, California 91436
(818) 986-8900; Fax (818) 990-7900

Scott A. Miller, Bar No. 230322
LAW OFFICES OF SCOTT A. MILLER, APC
16133 Ventura Blvd., Suite 1200
Encino, California 91436
(818) 788-8081; Fax (818) 788-8080

Attorneys for Plaintiff
DOLORES A. ARREGUIN, for
herself and other members
of the general public similarly situated

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DOLORES A. ARREGUIN, for herself
and other members of the general public
similarly situated,

Plaintiffs,

v.

GLOBAL EQUITY LENDING, INC., a
Georgia Corporation; and DOES 1
through 10, Inclusive,

Defendants.

CASE NO. C 07-06026 MHP
[Filed: November 29, 2007]

*[Assigned for all Purposes to:
Honorable Judge Marilyn H. Patel]*

**DECLARATION OF PLAINTIFF
DOLORES A. ARREGUIN IN
SUPPORT OF OPPOSITION TO
MOTION TO DISMISS FOR
IMPROPER VENUE AND MOTION
TO COMPEL ARBITRATION**

Date : March 3, 2008
Time : 2:00 p.m.
Place : Courtroom 15

1 I am the Plaintiff in this lawsuit. The facts contained herein are based on my
2 own personal knowledge. If called as a witness, I could and would testify to the
3 following:

4 1. I was hired by World Lending Group as a Loan Originator on July 29,
5 2002. World Lending Group later changed its name to Global Equity Lending, Inc.,
6 Attached hereto as Exhibit "1" is a true and correct copy of a letter I received from
7 World Lending Group dated July 29, 2002. It is my understanding that World
8 Leadership Group, Inc., is the parent company of Global Equity Lending, Inc. This
9 letter confirms that my employment with World Lending Group as a Loan Originator
10 began on July 29, 2002. Additionally, Global Equity Lending, Inc. was not a
11 licensed residential lender in California until August of 2002. Since I was paid on
12 commission, I would not have signed on with World Lending Group four months in
13 advance of being able to sell loans.

14 2. My duties as a Loan Originator included originating loans for World
15 Lending Group. As part of my responsibilities I was required to drive my car to
16 customers and potential customers to have them sign loan documents and things of
17 that nature. Nearly all of the loan business I conducted was in the State of California.

18 3. On or about January 31, 2008, my attorney faxed me a copy of the
19 Global Equity Lending, Inc., Mortgage Loan Originator Employment Agreement
20 ("Agreement") attached as Exhibit "A" to the Declaration of Sandra Croteau. This
21 was the first time that I have ever seen this Agreement. I did not electronically
22 execute this Agreement on April 2, 2002, as Global represents. I know this because I
23 was not working for Global at the time. To the best of my recollection, on April 2,
24 2002, I was working as a licensed insurance agent for World Financial Group.

25 4. I currently reside in Sacramento, California. My education consists of a
26 high school diploma and some college courses. My date of birth is July 6, 1948. I
27 receive \$1,488 per month from a pension. I also receive \$512 bimonthly in
28 unemployment benefits that will terminate at the end of March 2008. I do not have

1 the financial resources to litigate this case in the State of Georgia. I do not have the
2 funds to pay for travel and accommodations in the State of Georgia even if I wanted
3 to litigate this case there. If this case is transferred to Georgia, I will in all probability
4 be required to abandon my claims.

5 5. Based on my employment with World Lending Group/Global Equity
6 Lending, Inc., it is my understanding that there are over 20,000 past and present loan
7 agents who worked for Global in the State of California.

8 I declare under penalty of perjury, pursuant to the laws of the United States and
9 the State of California, that the foregoing is true and correct.

10 EXECUTED this 4 day of February 2008, at Sacramento, California.

11
12
13 
14 Dolores A. Arreguin

1 the financial resources to litigate this case in the State of Georgia. I do not have the
2 funds to pay for travel and accommodations in the State of Georgia even if I wanted
3 to litigate this case there. If this case is transferred to Georgia, I will in all probability
4 be required to abandon my claims.

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7 agents who worked for Global in the State of California.

8 I declare under penalty of perjury, pursuant to the laws of the United States and
9 the State of California, that the foregoing is true and correct.

10 EXECUTED this ___ day of February 2008, at _____, California.
11
12
13

14 _____
Dolores A. Arreguin
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EXHIBIT 1



Monday, July 29, 2002

DOLORES ARREGUIN - AF0099
1400 BRETT HARTE CT
ROSEVILLE, CA 95661

Congratulations on your decision to join World Lending Group. We would like to welcome you as our newest field employee and to inform you that your official start date is 7/29/2002. Your decision to join our company opens a whole new world of opportunity for you.

Your upline Regional Marketing Director is your first line of support in helping you build a thriving business. Your leader can answer your questions, give you advice, and help you master the Leadership Format System and our mortgage marketing process. We would also invite you to take the time to explore our company web sites at worldlendinggroup.com and worldleadershipgroup.com to learn more details about our company, the opportunity products, and our great leadership team.

WLG offers a unique opportunity to be in business for yourself but not by yourself in one of the most exciting industries in business today. We look forward to celebrating many personal and career achievements with you in the near future.

Again, World Lending Group is happy to welcome you as our newest field employee as of your official start date, 7/29/2002.

See You at the Top!

Andy Woodman
President
World Lending Group

PROOF OF SERVICE
BY MAIL

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 269 W. Bonita Avenue, Claremont, CA 91711.

On **February 15, 2008**, I served the foregoing document described as: **DECLARATION OF PLAINTIFF DOLORES A. ARREGUIN IN SUPPORT OF OPPOSITION TO MOTION TO DISMISS FOR IMPROPER VENUE AND MOTION TO COMPEL ARBITRATION**

☐ by placing the true copies thereof enclosed in sealed envelopes addressed as follows:

☒ by placing ☐ the original ☒ a true copy thereof enclosed in sealed envelopes addressed as follows:

☒ Via Facsimile.

☐ Via Overnight Delivery.

[SEE ATTACHED SERVICE LIST]

☒ I deposited each envelope in the mail at Claremont, California.¹ The envelope was mailed with postage thereon fully prepaid.

☒ As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the United States Post Office on that same day with postage thereon fully prepaid at Claremont, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

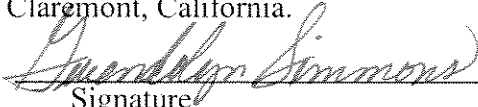
☐ As follows: I am "readily familiar" with the firm's practice for delivering overnight envelopes or packages to an authorized courier or driver authorized by the express service carrier to receive documents, in an envelope or package designated by the express service carrier with delivery fees paid or provided for, addressed to the person on whom it is to be served, at the address as last given by that person on any document filed in the cause and served on the party making service.

☐ (State or Federal) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on **February 15, 2008**, at Claremont, California.

Gwendolyn Simmons
Type or Print Name


Signature

bag.

SERVICE LIST

ARREGUIN V. GLOBAL EQUITY LENDING
United State District Court Northern District Case No. C07-03026 MHP

Richard M. Williams, Bar No. 68032 (Via facsimile and mail)

Gregory M. Gentile, Bar No. 142424

ROPERS, MAJESKI, KOHN & BENTELY

80 N. First Street

San Jose, CA 95113

(408)287-6262 - Telephone

(408)918-4501 - Facsimile

Attorneys for Defendant

GLOBAL EQUITY LENDING INC.

Scott A. Miller, Bar No. 230322 (Via U.S. mail only)

Steven L. Miller, Bar No. 106023

LAW OFFICES OF SCOTT A. MILLER, APC

16133 Ventura Blvd., Suite 1200

Encino, California 91436

(818) 788-8081 - Telephone

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Co-Counsel for Plaintiff

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